

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Mahmoud KHALIL,

Petitioner,

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

Respondents.

Case No. 2:25-cv-01963

Hon. Michael E. Farbiarz

**NOTICE OF MOTION
FOR LEAVE TO FILE
BRIEF AS *AMICI
CURIAE* IN SUPPORT
OF PETITIONER'S
MOTION FOR
PRELIMINARY
INJUNCTION**

PLEASE TAKE NOTICE that the Foundation for Individual Rights and Expression, The Rutherford Institute, the First Amendment Lawyers Association, the National Coalition Against Censorship, and PEN American Center, Inc. hereby move before the Honorable Michael E. Farbiarz, United States District Judge at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ, for an order granting leave to file a brief as *amici curiae* in support of petitioner's motion for a preliminary injunction in the above-captioned proceeding as soon as practicable based upon the parties proposed schedule (ECF 84) but no later than the regular April 21, 2025 motion day.

PLEASE TAKE FURTHER NOTICE that, in support of this motion, *amici* will rely upon the accompanying brief in support of this motion for leave to file brief as *amici curiae*.

The proposed *amici curiae* brief and a proposed order is attached.

Dated: March 20, 2025

Respectfully Submitted,

/s/ Greg H. Greubel

Greg H. Greubel

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*Pro hac vice application forthcoming